

SIERRA COUNTY

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November 22, 2011

From:

Bill Nunes
Sierra County Supervisor
District #3

To:

Postal Regulatory Commission
Docket No. A2012-22

I am writing this as PRC form 61 "Participant Statement" in support of my letter of appeal dated October 3, 2011, regarding the closure of the Post Office in Calpine, California.

As a member of the Sierra County Board of Supervisors, I am also filing this statement in conjunction with the letter of appeal from Sierra County dated October 24, 2011, and signed by Lee Adams, Chairman of the Board.

The issues we would like the Commission to consider are:

The Postal Service failed to adequately consider the effects of closing the Sattley/Calpine Post Office on the communities of Calpine and Sattley.

I have attached four pictures of a residence in Calpine located one block from the Post Office. They show an average winter accumulation of snow. The Postal Service has said it plans to deliver our mail to some type of outdoor boxes. We see no way – and the Postal Service has shown no way – mail can be delivered to outdoor boxes and accessed by residents considering the amount of snow that piles up along our narrow streets.

Calpine can receive 12-18 inches of snow in a 24-hour period for sustained periods of time. These boxes would have to be shoveled out daily during these periods.

There are residents in town who receive medical prescription drugs through the mail. They often have to sign for these deliveries. We see no way these people – many of whom are senior citizens – can access their prescriptions during the winter.

This concern was raised by residents in their comments to the Postal Service but there is nothing in the record to indicate these concerns were addressed. The concerns were, instead, generalized to allow for a pre-generated response.

In addition, there is nothing in the Administrative Record to indicate that the Postal Service has complied with the National Environmental Policy Act (NEPA) which requires it to consider the social, economic, physical and cumulative effects of the decision.

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This determination is not consistent with the policy of the government...that the Postal Service shall provide a maximum degree of effective and regular postal services to rural areas, communities and small towns where post offices are not self-sustaining.

The Calpine Post Office is located inside the community hall owned by Sierra County. The county snow plows the parking lot and pedestrian access at no cost to the Postal Service. We have offered to reduce the rent and will consider an amount equal to what it would cost the Postal Service to install and maintain outdoor boxes.

I have attached copies of a letter and email to postal representatives making this offer. After sending the letter to Ms. Felix, we received a telephone call from Ms. Berry asking for a formal proposal. We sent that proposal but received no response and there is nothing in the Administrative Record that indicates the Postal Service considered our proposal

The Postal Service has said services would be available from the route carrier. Rather than conducting those transactions outside in a snow storm, why not do it inside? Why not let our postal employee open the window inside and conduct business while the mail is being put up in the boxes? We have proposed reducing the number of hours the window is open as a savings.

Again, we have received no response and there is nothing in the Administrative Record that indicates the Postal Service considered our proposal.

The Postal Service proposal is to deliver the Calpine mail out of Clio, California. That will require residents to drive 11 miles one-way over Calpine Summit to access postal services if they are unable to meet the route carrier. There is even more snow over the summit than there is in the pictures I have attached of Calpine and that road is often under chain controls in the winter.

We do not see – for all of the above reasons – how this provides “a maximum degree of effective and regular postal services” to our rural community.

The Postal Service has not accurately shown the savings resulting from the closing of the Post Office.

In its Final Determination to Close, the Postal Service lists its Total Annual Savings as \$55,908. It also lists its Annual Cost of Replacement Services as \$0. The Postal Service has never shown its actual net savings since there has to be some costs to installing and maintaining outdoor boxes as well as paying someone to put the mail in those boxes and transacting postal services.

The Postal Service knew these figures were incorrect at the time of its determination. They had the county’s offer to reduce the rent at the time the determination was made and still listed the rent as the original amount.

The Postal Service did not follow the procedure required by law.

Even though the Postal Service held a public meeting in Calpine, it became evident to us that they were merely going through the process with a decision already made to close the Post Office. As we mentioned in our earlier letters, residents received computer-generated, generic letters to the concerns they raised; the point of delivery for mail was changed from Sierraville to Clio in the middle of the process; and, the Final Determination to Close posted in September was mostly verbatim to the Proposal to Close posted in June.

In the Administrative Record submitted on 11/4/2011, by the Postal Service, in the 4th pdf attachment, the Proposal to Close dated June 29, 2011, states on page 2 “The Postal Service is proposing to close the Sattley, CA Post Office and provide delivery and retail services by highway contract route service under the administrative responsibility of the Clio Post Office, located 13 miles away.”

I have attached a copy of the Proposal to Close posted in the Sattley/Calpine Post Office on June 29, 2011, and it was the “Sierraville” Post Office, not the “Clio” Post Office. The proposal was changed from Sierraville to Clio in August, more than a month after the original posting.

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Looking at a flat road map of our region, it may appear there is little difference between driving to Sierraville and driving to Clio. However, highway and weather conditions, typography and the driving/commuting needs of Calpine residents make Sierraville an entirely different destination than Clio.

The fact is: The Proposal to Close submitted by the Postal Service in the Administrative Record is not the same Proposal to Close that was posted in the Calpine Post Office on June, 29, 2011.

The Final Determination to Close was posted on September 26, 2011. Seven days later the postal employee in Calpine was told to cross out Clio and write in Portola. I have enclosed a copy of that changed notice.

On October 13, 2011, seventeen days after the original posting, the employee was sent a copy of the original posting that listed Clio, told to back-date it to September 26, remove the notice that scratched out Clio and wrote in Portola, and post the new notice as if it had been there since September 26.

In summary, the Postal Service failed to adequately consider the impacts on the community; failed to meet the requirements of NEPA; failed to offer a proposal to provide a maximum degree of effective and regular postal services to our rural area; failed to consider and identify the economic savings to the Postal Service; and failed to follow the procedures required by law.

We submit these points – along with the issues raised in our previous letters of appeal – for the Commission in its consideration of our request.

Sincerely,

Bill Nunes
Sierra County Supervisor
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